



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Former Imperial Metal and Chemical Company
3400 Aramingo Avenue, Philadelphia, PA
RCRA ID: PAD070283023

DATE: 07/14/2020

Long-term Stewardship Assessment

FROM: Barbara Smith, Project Manager (3LD10)

TO: Long Term Stewardship File for Imperial Metal and Chemical Company
RCRA Corrective Action Branch 2 (3LD20)

A handwritten signature in blue ink, which appears to read "Paul G. Gotschall".

Remedy Review Summary:

EPA's Final Remedy Decision (9/16/2013) required the former Imperial Metal and Chemical Company, located at 3400 Aramingo Avenue, Philadelphia, PA, to record an environmental covenant. The covenant was recorded by the City of Philadelphia Recorder of Deeds on 4/01/2011. The covenant requires that the engineered controls (impervious surfaces, i.e., asphalt parking lot and concrete floor in IHOP basement) be maintained, and an institutional control (covenant), prohibits groundwater use. Disturbance of engineered controls requires PADEP written approval. The covenant also requires annual compliance reporting to PADEP. EPA has determined that the property is in compliance with EPA's remedy decision/covenant restrictions. The property is ready for reuse.

Document Review:

The most recent aerial image of the former Facility (5/2019, Google Earth Pro™) shows that property use has not changed since the final remedy/covenant implementation. The former industrial property (originally 3.5 acres) is now Imperial Plaza Shopping Center and occupies a city block (6.8 acres), consisting of a paved parking lot surrounded on three sides by contiguous retail/commercial shops (see Figure below). Philadelphia Water Department supplies water to the shopping center.

The Environmental Covenant is available on PA's Activity and Use Limitation website and on EPA's Fact Sheet for the Facility. The covenant lists the current property Owner/Grantor and Holder/Grantee as Imperial Aramingo Limited Partnership, c/o Lerner-Heidenberg Properties, in Closter, NJ. Covenant restrictions are summarized in the Table below. The Covenant applies to the areas outlined in the Figure below.

PADEP reviews the annual remedy implementation compliance reports required by the covenant.



Background:

Imperial Metals and Chemicals Company (Imperial) was a 3.5-acre Facility that manufactured type metal and zinc and magnesium plates for the graphic arts industry from at least 1930 to 1986. Type metal was phased out in 1986 and the Facility began manufacturing aluminum based lithographic plates. In 1987, the Facility was demolished, and a shopping center was built on the former Facility location, encompassing the 6.8-acre city block. In 2005, during an environmental investigation, light non-aqueous phase liquid (LNAPL) was observed in two sumps located in the basement of the IHOP restaurant located on the former Facility. The LNAPL was fingerprinted as significantly degraded fuel or similar material. It is unclear whether the LNAPL originated from the former Facility operations or from Tioga Fuels, located across the street from IHOP. Tioga Fuels stored bulk heating oil and kerosene at their Facility. Investigations showed that soil at the Facility met PADEP’s residential standards and that groundwater samples along the property boundary with Tioga Fuels were below PADEP’s non-residential screening levels except for one semi-volatile organic compound. The two sumps in the IHOP basement were removed and three feet of concrete was installed on top of the existing concrete basement floor of IHOP. Groundwater wells are no longer present on the Property. Philadelphia Water Department supplies water to the shopping center.

Documents Reviewed:

EPA Facility Fact Sheet, which includes EPA Statement of Basis for Remedy (8/15/2013), Environmental Covenant (4/01/2011), Environmental Indicator Forms, Facility boundary and Covenant areas (mapped 9/30/2017); Google Earth Pro™ image (5/2019); RCRAInfo database, PA Activity and Use Limitations (AUL) website.



Institutional Control/Engineering Control
 Corrective Action Remedy Summary

Facility Name	Imperial Metals & Chemical Company			
Address	3400 Aramingo Ave., Philadelphia, PA 19134			
EPA ID Number	PAD070283023			
Are there restrictions or controls that address:	Yes	No	Area(s)	Description of restrictions, controls and mechanism
Groundwater Use	X		Entire Facility (6.81 acres)	GW shall not be used for any purpose and installation of GW is prohibited on Property.
Residential Use	X		Entire Facility	The Property is for non-residential use only.
Excavation	X		Impervious Cap (Parking Area) and Concrete Basement Floor (IHOP)	Impervious cap (Parking Area) and concrete basement floor of IHOP restaurant (corner of Aramingo Ave. and E. Tioga St.) are not to be excavated except with PADEP written approval. Excavated materials will be handled according to regulations.
Vapor Intrusion	X		Basement Floor (IHOP)	Concrete floor prevents exposure to any vapor from residual LNAPL in shallow GW.
Capped Area(s)	X		Impervious Cap (Parking Area) and Concrete Basement Floor (IHOP)	The two capped areas are to be maintained; routine maintenance, e.g., underground utility work in Parking area excepted.
Other Engineering Controls		X		
Other Restrictions	X		Entire Facility	Annual Reporting to PADEP on compliance with Covenant. Approval of land use changes must receive prior approval by PADEP.